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February 22, 2019

Cal/OSHA Standards Board,

In regard to the proposed Indoor Heat Illness regulations, on behalf of the Contra Costa Water District I would like to submit the following comments, specifically regarding the requirements in subsection (e) and its effect on certain workplaces, particularly water utilities.

Water utilities in California generally have systems designed with many remote “out buildings”. These buildings contain equipment, such as pumps and motors, and are housed within walls and a roof primarily for the purposes of security, weather protection, and sound deadening. These are not regularly staffed facilities and are located throughout the water service area (for the Contra Costa Water District, the water service area is 137,127 acres). As such, while the buildings have venting, they generally do not have air conditioning or other building cooling systems installed. Temperatures in these buildings generally match the temperature/heat index of the surrounding outside environment.

These buildings are only periodically visited by employees for preventative maintenance or repairs. Requiring employers to take heat measurements during times of the work shift initially and when it is suspected to be 10 degrees or more above previous measurements, as specified in subsection (e), places an unreasonable burden on the employer. Installing temperature monitoring equipment on each facility or providing each employee with equipment and training would be a significant investment and administrative hurdle that is sure to provide minimal improvements in worker safety. For example, at Contra Costa Water District, there are over 100 “out buildings” that may fall under this standard. CCWD is an average-sized water agency with 300 employees and provides an example of the complex compliance effort that would be required.

Workers going to remote and unstaffed facilities working for water utilities are indoor/outdoor workers, and conduct work in both environments throughout the day. As such, they are already compliant with the outdoor heat illness standard which provides significant protection from heat. Conducting additional temperature monitoring is unlikely to change the procedures utilized by employers complying with the outdoor heat illness standard.

Please consider either removing the subsection (e) requirement to conduct temperature/heat index monitoring, or provide an exception for employers that have workers who conduct work both indoors and outdoors during the course of a day, and allow them to instead follow the outdoor heat illness standard for those workers.

Thank you for your consideration,

A handwritten signature in black ink that reads "Sarah Bogner". The signature is written in a cursive, flowing style.

Sarah Bogner, CSP, MS
Manager of Health and Safety
Contra Costa Water District